

U.S. Department of Justice

United States Attorney
Southern District of New York

United States District Courthouse
300 Quarropas Street
White Plains, New York 10601

May 25, 2021

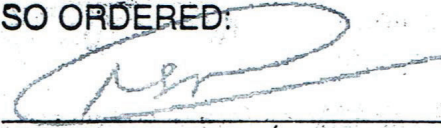
BY CM/ECF and Electronic Mail

The Honorable Nelson S. Román
United States District Judge
Southern District of New York
300 Quarropas Street
New York, New York 10601

The parties' request to adjourn the Status Teleconf. from May 24, 2021 until July 20, 2021 at 3:00 pm or, alternatively, July 22, 2021 at 3:00 pm is granted. The Clerk of Court requested to terminate the motion (doc. 40).

Dated: May 25, 2021

SO ORDERED:


HON. NELSON S. ROMAN
UNITED STATES DISTRICT JUDGE

**Re: *United States v. Fernando Fuentes-Reyna and Victor Guzman*,
19 Cr. 736 (NSR)**

Dear Judge Román:

The Government writes respectfully, on behalf of all parties, to request an adjournment of the status conference scheduled for yesterday, May 24, 2021, or, in the alternative, for today, May 25, 2021.¹

On April 27, 2021, the Court adjourned the status conference then scheduled for April 29, 2021, to May 24, 2021, or, in the alternative, May 25, 2021. (Docket Entry 34). On May 14, 2021, the Court excluded time, pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), through today. (Docket Entry 36).

The parties believe they have arrived at dispositions in principle. Indeed, just today, the Court made CARES Act findings to allow defendant Victor Guzman to enter a plea remotely. (Docket Entry 39). The Government expects that that plea will be scheduled shortly, and that defendant Fernando Fuentes-Reyna will also seek a plea hearing shortly. If the parties appeared, they expect they would ask for an adjournment in order to continue those discussions and to arrange such pleas. Accordingly, in order to preserve judicial resources, and minimize unnecessary travel during the pendency of various emergency orders, the parties respectfully request that tomorrow's conference be adjourned for approximately one month. The Court's Courtroom Deputy has indicated that the Court is available for a status conference—if one

¹ The parties communicated with the Court's Courtroom Deputy, who informed the parties that, in anticipation of this request, the parties did not have to appear for the scheduled status conference.

remains necessary—on July 20, 2021, at 3:00 pm or, in the alternative, July 22, 2021, at 3:00 pm.

Accordingly, the Government respectfully requests that the status conference be adjourned to July 20, 2021, at 3:00 pm or, in the alternative, July 22, 2021, at 3:00 pm.

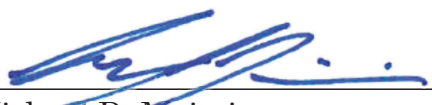
Additionally, the ends of justice served by granting a continuance outweigh the best interests of the public and the defendants in a speedy trial, because, among other things, it will allow defense counsel to review discovery with their clients, determine what pre-trial motions, if any, to make and prepare such motions, prepare for trial, engage in disposition discussions, and likely enter guilty pleas. Accordingly, the Government respectfully requests that time be excluded pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), though July 22, 2021, or such other date that this Court sets for the adjourned conference. Defense counsel have consented to such an exclusion of time. I have attached a proposed order excluding time.

Please feel free to contact me with any questions or issues.

Respectfully submitted,

AUDREY STRAUSS
United States Attorney

By:



Michael D. Maimin
Assistant United States Attorney
(914) 993-1952

cc: Lawrence John Sheehan, Esq. (by electronic mail and CM/ECF)
Michael K. Burke, Esq. (by electronic mail and CM/ECF)